

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 02-46

THIRD SET OF INFORMATION REQUESTS TO
THE TOWN OF ASHLAND

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to the Town of Ashland (“Ashland”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Ashland in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer. Attachments should be labeled and attached to the first information request response to which the document is responsive; subsequent information request responses may reference the attachment without attaching additional copies, e.g., DTE F-2-1, exh. A.
2. Do not wait for all answers to be completed before supplying answers. File the responses as they are completed but no later than the close of business on **May 7, 2003**.
3. These requests shall be deemed continuing so as to require further supplemental responses if the respondent or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
5. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

6. Please serve one (1) original copy of the responses on Mary Cottrell, Secretary of the Department, and one (1) copy to each party on the service list. Also submit six (6) copies of the responses to Jesse S. Reyes, Hearing Officer.
7. When feasible, copies of all nonproprietary documents that are filed with the Department must also be submitted to the Department in electronic format using one of the following methods: (1) by e-mail attachment to dte.efiling@state.ma.us and to Jesse.Reyes@state.ma.us; or (2) on a 3.5" disk, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) an easily identifiable case caption, (2) docket number D.T.E. 02-46, (3) name of the party submitting the filing, and (4) title of the document. The electronic filing should also include the name, title, and phone number of a person to contact in the event of questions about the filing. Electronic copies should be written in either Word Perfect (naming the document with a ".wpd" suffix), Microsoft Word (naming the document with a ".doc" suffix), or Adobe Acrobat (naming the document with a ".pdf" suffix). Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department's website, <http://www.mass.gov/dpu>. Electronic copies must also be provided to all persons on the service list and to Department staff for this proceeding.

Electronic copies must be submitted on the same date that paper copies are filed with the Department. Electronic submission is not a substitute for filing and service of materials.

8. Documents are deemed filed upon receipt in hand or via first class mail of the original paper copies, by the Secretary of the Department, not upon mailing or electronic submission.

Information Requests

- DTE A-3-1 Is Ashland in compliance with all discharge limits in its (a) current and (b) most recent prior Municipal Discharge Permit? If not, please identify the discharge limits for which Ashland is not in compliance.
- DTE A-3-2 Please describe the terms of any agreement with MWRA currently in effect on the subject of sulfate, sulfide, or BOD discharges, and provide a copy of all such agreements. If Ashland currently does not have such an agreement with MWRA, does it anticipate entering into an agreement, and if so, approximately when, and on what terms?

DTE A-3-3 Please refer to Ashland's response to information request FRA 1-10.

- a. Would batteries be a viable means of providing power to a flow meter at Farm Pond? If not, why not?
- b. Please describe alternative options for providing electric power to a flow meter at the Farm Pond location, stating all steps necessary to obtain power under each option.

DTE A-3-4 Are the current maximum discharge rates in the IMA sufficient to meet Ashland's current needs? Does Ashland foresee the current maximum discharge rates becoming a constraint?